

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

FILED

OCT - 3 2017

CLERK'S OFFICE
U.S. DISTRICT COURT
EASTERN MICHIGAN

Neal Cohen; Darren Chaffee; SSL
Assets, LLC,

Plaintiffs,

v.

Jaffe, Raitt, Heuer & Weiss, P.C;
Jeffrey M. Weiss; Lee B. Kellert;
and Deborah L. Baughman,

Defendants.

Case No.: 2:16-cv-11484-GCS-APP

JURY VERDICT FORM

QUESTION NO. 1: Were any of the defendants professionally negligent as claimed by the plaintiffs?

ANSWER: Yes (Yes or No)

If your answer is “yes,” go to question 2. If your answer is “no,” do not answer any further questions.

NEAL COHEN AND DARREN CHAFFEE

QUESTION NO. 2: Was the defendants’ professional negligence a proximate cause of the damage to Neal Cohen (“Cohen”) and Darren Chaffee (“Chaffee”)?

ANSWER: Yes (Yes or No)

If your answer is “yes,” continue to question 3. If your answer is “no,” go to question 9.

QUESTION NO. 3: What is the total amount of damages for Cohen and Chaffee?

ANSWER: Neal Cohen: \$ 3,181,000

Darren Chaffee: \$ 3,181,000

Continue to question 4.

QUESTION NO. 4: Did Cohen and Chaffee use reasonable care and diligence to minimize their damages?

ANSWER: NO (Yes or No)

If your answer is “yes,” go to question 6. If your answer is “no,” continue to question 5.

QUESTION NO. 5: What amount of the damages set forth in question 3 do you believe Cohen or Chaffee should have minimized through reasonable care and diligence?

ANSWER: Neal Cohen: \$ 2,148,000

Darren Chaffee: \$ 2,514,000

Continue to question 6.

QUESTION NO. 6: Were Cohen or Chaffee negligent as claimed by the defendants?

ANSWER: NO (Yes or No)

If your answer is “yes,” continue to question 7. If your answer is “no,” go to question 9.

QUESTION NO. 7: Was Cohen’s or Chaffee’s negligence a proximate cause of any of the damage they claim?

ANSWER: _____ (Yes or No)

If your answer is “yes,” continue to question 8. If your answer is “no,” go to question 9.

QUESTION NO. 8: For the amount of damages you believe Cohen and Chaffee are entitled to recover, and using 100% as the total, what percentage of fault do you attribute to the defendants, and what percentage do you attribute to Cohen and Chaffee?

ANSWER: _____ % to Defendants

_____ % to Neal Cohen and Darren Chaffee

Continue to question 9.

SSL ASSETS, LLC

QUESTION NO. 9: Did the defendants have an attorney-client relationship with SSL Assets, LLC (“SSL”)?

ANSWER: Yes (Yes or No)

If your answer is “yes,” go to question 10. If your answer is “no,” do not answer any further questions.

QUESTION NO. 10: Was the defendants’ professional negligence a proximate cause of the damage to SSL?

ANSWER: Yes (Yes or No)

If your answer is “yes,” go to question 11. If your answer is “no,” do not answer any further questions.

QUESTION NO. 11: What is the total amount of damages for SSL?

ANSWER: \$ 3,259,960

Continue to question 12.

QUESTION NO. 12: Did SSL use reasonable care and diligence to minimize its damages?

ANSWER: Yes (Yes or No)

If your answer is “yes,” go to question 14. If your answer is “no,” go to question 13.

QUESTION NO. 13: What amount of the damages set forth in question 11 do you believe SSL should have minimized through reasonable care and diligence?

ANSWER: \$ _____

Go to question 14.

QUESTION NO. 14: Was SSL negligent as claimed by the defendants?

ANSWER: NO (Yes or No)

If your answer is “yes,” continue to question 15. If your answer is “no,” do not answer any further questions.

QUESTION NO. 15: Was SSL’s negligence a proximate cause of any of the damage it claims?

ANSWER: _____ (Yes or No)

If your answer is “yes,” continue to question 16. If your answer is “no,” do not answer any further instructions.

QUESTION NO. 16: For the amount of damages you believe SSL is entitled to recover, and using 100% as the total, what percentage of fault do you attribute to the defendants, and what percentage do you attribute to SSL?

ANSWER: _____ % to Defendants

_____ % to SSL

s/Jury Foreperson

In compliance with the Privacy Policy adopted by the Judicial Conference, the verdict form with the original signature has been filed under seal.

Date: 10 - 03 - 2017

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